

IN THE NORTHERN DISTRICT OF OKLAHOMA  
UNITED STATES OF AMERICA

PHILIP SANDERS, an Individual)  
and Husband and Next of Kin )  
of BRENDA JEAN SANDERS, )  
Deceased, )  
Plaintiff, )  
VS. ) Case No: 17-cv-492-JHP-FHM  
CREEK COUNTY BOARD OF COUNTY )  
COMMISSIONERS and SHERIFF )  
BRET BOWLING, in his official)  
Capacity as Creek County )  
Sheriff, and TURN KEY HEALTH )  
CLINICS, a limited liability )  
Company, )  
Defendants. )

\* \* \* \* \*

DEPOSITION OF TAMARA DAVIS

TAKEN ON BEHALF OF THE PLAINTIFF

ON THE 14TH DAY OF AUGUST, 2020,

AT THE WASHITA COUNTY COURTHOUSE

CORDELL, OKLAHOMA

\* \* \* \* \*

APPEARANCES:

Charles L. Richardson, 7447 S. Lewis Ave., Tulsa, Oklahoma  
74136, on behalf of the Plaintiff.

Paulina Thompson, 9801 N. Broadway Extension, Oklahoma City,  
Oklahoma 73114, on behalf of the Defendant Turn Key Health  
Clinic.

REPORTED BY:

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INDEX

-- TAMARA DAVIS DEPO 8/14/20 --



1 recall what they were called, but we had paperwork that  
2 our -- that the medical director had issued or we would  
3 bring them in for sick call, check them over, do the  
4 assessment, do all the documentation on it, and if it was --  
5 we would call their provider and get an order for what it  
6 required -- the documentation required, and then we would  
7 move them over to the list to see the provider if it was an  
8 ongoing issue or they needed to be seen.

9 Q. What do you mean by documentation?

10 A. It was a nurse documentation a provider -- that the  
11 provider looks over when they come in if they needed to give  
12 an order. I can't -- I don't -- I can't remember what the  
13 name of the paperwork is called.

14 Q. Okay. If you remember that, will you let me know?

15 A. Yes, sir.

16 Q. All right. So was there documentation that was  
17 different for different conditions?

18 A. Yes.

19 Q. Was there any paperwork for someone that was suffering  
20 from diarrhea?

21 A. Yes.

22 Q. Do you remember what was included in -- what needed to  
23 be documented if someone had diarrhea?

24 A. You would document the color of the stool, the  
25 consistency of the stool, any GI discomfort, their vital

1 signs, any medication allergies, and then it would give a  
2 standing order on the bottom of what to give per symptoms.  
3 And then, if it was an emergency issue, there's  
4 documentation on the bottom to go over and then call the  
5 provider.

6 Q. What would constitute an emergency when it comes to  
7 diarrhea?

8 A. I don't recall what's on the -- what was all on the  
9 paperwork.

10 Q. Okay. I take it that if it was not considered an  
11 emergency, that person would be scheduled to see the  
12 provider the next time the provider came?

13 A. If the symptoms continued.

14 Q. How long would the symptoms need to continue for, say,  
15 diarrhea before they should see a provider?

16 A. I don't recall what was on the documentation.

17 Q. All right. What's the importance of the color of the  
18 diarrhea?

19 A. Depending -- I'm not -- I'm not a doctor.

20 Q. Yeah.

21 A. I don't -- I can't diagnosis that, but, I mean, if  
22 there was blood in it, if it was dark. I don't --

23 Q. I know you may not know the importance of what each one  
24 means but --

25 A. Yes, sir.

1 Q. -- just what were you all supposed to report?

2 A. The color and consistency. Like if it was light brown,  
3 dark brown, red, yellow, that was all to be documented on  
4 the documentation.

5 Q. Okay. Do you know why it is you all were supposed to  
6 report if there was GI discomfort?

7 A. No, sir.

8 Q. What's considered GI discomfort?

9 A. Abdominal discomfort, cramps, bloating, nausea,  
10 vomiting.

11 Q. If someone had diarrhea, what would have to occur in  
12 order for a provider to be immediately contacted?

13 A. I don't recall.

14 Q. Did each facility have a procedure to follow in regards  
15 to whether it would be an immediate issue or it could wait  
16 until the provider showed up?

17 A. Yes, sir.

18 Q. Was all that contained in the document that you can't  
19 think of right now?

20 A. Yes, sir.

21 Q. Okay. If an inmate's had diarrhea for more than a  
22 week, was it your understanding they should see a provider?

23 A. Yes, sir.

24 Q. I used a week. Is there a specific number of days a  
25 person should have diarrhea before they're supposed to see